THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

Case No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

as representative of

THE COMMONWEALTH OF PUERTO RICO et al.,

Debtors.¹

INFORMATIVE MOTION OF ASSURED GUARANTY CORP. AND ASSURED GUARANTY MUNICIPAL CORP. REGARDING THE JULY 29-30, 2020, OMNIBUS HEARING

To the Honorable United States District Court Judge Laura Taylor Swain:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, "<u>Assured</u>") hereby submit this informative motion in compliance with the *Order Regarding Procedures for July 29-30, 2020, Omnibus Hearing* (ECF No. 13746)², and respectfully state as follows:

1. William J. Natbony and/or Casey J. Servais of Cadwalader, Wickersham & Taft LLP will speak on behalf of Assured at the July 29-30, 2020, Omnibus Hearing, which will be conducted telephonically via CourtSolutions due to the ongoing public health crisis.

The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² "<u>ECF No.</u>" refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

Case:17-03283-LTS Doc#:13826 Filed:07/24/20 Entered:07/24/20 11:19:22 Desc: Main Document Page 2 of 4

- 2. Mr. Natbony and/or Mr. Servais will present oral argument on behalf of Assured related to the following: (i) the *Objection of Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Ambac Assurance Corporation to the Motion of the Commonwealth of Puerto Rico Pursuant to Bankruptcy Rule 9019 for an Order Approving Stipulation and Agreed Order (A) Allowing PRIFA BANs Guarantee Claim, (B) Authorizing Escrow of PRIFA Funds and (C) Directing the Dismissal of Litigation with Prejudice (ECF No. 12699); and (ii) all other related papers.*
- 3. Mr. Natbony and/or Mr. Servais reserve the right to be heard on any matter raised by any party at the July 29-30, 2020, Omnibus Hearing as concerns Assured related to the Title III Cases, or any adversary proceeding pending in the Title III Cases, or the interests of Assured.

Dated: July 24, 2020

New York, New York

CASELLAS ALCOVER & BURGOS P.S.C.

CADWALADER, WICKERSHAM & TAFT LLP

By: /s/ Heriberto Burgos Pérez

Heriberto Burgos Pérez USDC-PR No. 204,809 Ricardo F. Casellas-Sánchez USDC-PR No. 203,114 Diana Pérez-Seda USDC-PR No. 232,014

USDC-PR No. 232,014 P.O. Box 364924

San Juan, PR 00936-4924 Tel.: (787) 756-1400

Fax: (787) 756-1401

E-mail: hburgos@cabprlaw.com rcasellas@cabprlaw.com dperez@cabprlaw.com

Counsel for Assured Guaranty Corp. and Assured Guaranty Municipal Corp.

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.* Mark C. Ellenberg* William J. Natbony* Ellen M. Halstead* Thomas J. Curtin* Casey J. Servais* 200 Liberty Street

New York, New York 10281

Tel.: (212) 504-6000 Fax: (212) 406-6666

Email: howard.hawkins@cwt.com mark.ellenberg@cwt.com bill.natbony@cwt.com ellen.halstead@cwt.com thomas.curtin@cwt.com casey.servais@cwt.com

Counsel for Assured Guaranty Corp. and Assured Guaranty Municipal Corp.

^{*} Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, the 24th day of July, 2020.

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.*

* Admitted pro hac vice